

# **VANDERSLICE DECL. EXHIBIT A6**

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10 NEXTDOOR HOLDINGS, INC.

11  
12 UNITED STATES DISTRICT COURT  
13 NORTHERN DISTRICT OF CALIFORNIA  
14

15 MAXIMILLIAN KLEIN, et al.,

16 Plaintiff,

17 vs.

18 META PLATFORMS, INC.,

19 Defendant.  
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Case No. 3:20-cv-08570-JD

**DECLARATION OF KATELYN  
WOLFGANG ON BEHALF OF NON-PARTY  
NEXTDOOR HOLDINGS, INC.**

Hon. Judge James Donato

1 I, the undersigned, Katelyn Wolfgang, pursuant to 28 U.S.C. § 1746, hereby declare:

2 1. I am a member of the Legal Team at Non-Party Nextdoor Holdings, Inc.  
3 (“Nextdoor”) and, by reason of my position, I am authorized and qualified to make this declaration.  
4 I have personal knowledge of all facts set forth in this declaration and could testify competently as  
5 to the matters set forth in this declaration.

6 2. Based on my personal knowledge and on information provided to me by others at  
7 Nextdoor, the quotes from Flora Hsu’s depositions that are used in the Declaration of Dr. Nicholas  
8 Economides in Support of Consumer Plaintiffs’ Motion for Class Certification Errata, dated July 27,  
9 2023, (“Economides Declaration”) should remain under seal.

10 3. The excerpts from Ms. Hsu’s depositions cited in the Economides Declaration that  
11 should remain under seal can be found in the record in the following places:

- 12 a. Flora Hsu Tr. (Klein) (April 12, 2023) at 11:13–15;
- 13 b. Flora Hsu Tr. (FTC) (April 12, 2023) at 260:5–261:20;
- 14 c. Flora Hsu Tr. (FTC) (April 12, 2023) at 242:17–243:15;
- 15 d. Flora Hsu Tr. (FTC) (April 12, 2023) at 179:7—8, 242:16–243:6;
- 16 e. Flora Hsu Tr. (Klein) (April 12, 2023) at 12:20–13:15;<sup>1</sup>
- 17 f. Flora Hsu Tr. (FTC) (April 12, 2023) at 264:18–20;
- 18 g. Flora Hsu Tr. (FTC) (April 12, 2023) at 241:8–16, 261:11–20;
- 19 h. Flora Hsu Tr. (FTC) (April 12, 2023) at 151:9–12;
- 20 i. Flora Hsu Tr. (Klein) (April 12, 2023) at 8:9–14; and
- 21 j. Flora Hsu Tr. (FTC) (April 12, 2023) at 236:6–238:11.

22 4. Additionally portions of the Economides Declaration copy, summarize, and/or  
23 compile information that should remain under seal. Those portions that should remain under seal  
24 are in the following places:

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27 <sup>1</sup> The Economides Declaration cites “Flora Hsu Tr. (FTC) (May 12, 2023) at 12:20–13:15.” *See*  
28 Economides Decl. fn. 270. However, the quoted content prior to the cite is from the *Klein* transcript  
and this declaration requests the *Klein* transcript content remain sealed.

- a. Footnote 125 of the Economides Declaration from the phrase “For example” to the word “competition”;
- b. Paragraph 167 of the Economides Declaration from the phrase “Flora Hsu of Nextdoor” to the word “apps”;
- c. Paragraph 185 of the Economides Declaration from the phrase “Flora Hsu—Nextdoor’s corporate representative” to the words ““social graph””;
- d. The entire parenthetical quoting Ms. Hsu’s deposition in Footnote 256 of the Economides Declaration beginning with “(Q. Okay. . .” to the closing of the parenthesis;
- e. Paragraph 194 of the Economides Declaration from the phrase “Flora Hsu—Nextdoor’s corporate representative” to “oftentimes”;
- f. Paragraph 202 of the Economides Declaration from the word “Nextdoor” to “you”;
- g. Paragraph 203 of the Economides Declaration from the word “Nextdoor’s” to the phrase ““social graph””; and
- h. Paragraph 204 of the Economides Declaration from the phrase “Nextdoor’s corporate representative” to “Snapchat.”

5. These portions of Ms. Hsu’s transcript should remain under seal as Confidential Information pursuant to the protective orders in the *FTC v. Meta Platforms, Inc.* action (Case No. 1:20-cv-03590) and the *Klein (Consumer Plaintiffs) v. Meta Platforms, Inc.* action (Case No. 3:20-cv-08570) that govern the matters in which the depositions were taken. Each cited excerpt contains Nextdoor confidential competitive research and/or commercial information and/or Nextdoor information that has not been published or otherwise made publicly available.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

1 Executed this 14<sup>th</sup> day of November, 2023.

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